

REMARKS

Applicants request favorable reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks.

Claims 230 through 249 are pending in the present application, with Claims 230, 242, and 244-247 being independent.. Claims 1-158 and 165-229 have been canceled without prejudice.

Applicants do not intend to make substantive amendments to the claims by this Amendment. However, in order to reduce the number of pending claims and expedite prosecution, all pending claims have been cancelled and replaced by a new set of 20 claims based on the previously pending claims. Applicants submit that support for these amendments can be found in the original disclosure and, therefore, no new matter has been added.

Claims 1-19, 45-68, 76-158 and 165-228 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,081,255 (Narabu). Applicants respectfully traverse this rejection for the reasons discussed below.

As recited in independent Claim 230, the present invention includes, *inter alia*, the features of generating a difference signal for each photoelectric conversion element and setting a threshold value on the basis of a level of the difference signal obtained from each photoelectric conversion element. Thus, the threshold value is set for each photoelectric conversion element, and the threshold value is set based on each difference signal, i.e., the threshold value is changed each time a detection occurs and a new difference signal is generated. Because the threshold value is set (i.e., changed) for each photoelectric

conversion element, dispersion of each photoelectric conversion element is adsorbed. (See page 41, lines 9-11 of the substitute specification.)

Applicants submit that the cited art fails to disclose or suggest at least the above-mentioned features, and therefore it also cannot realize the above-noted advantage of the present invention. For example, Narabu determines a position by comparing a threshold set by threshold generator 47 with the output of a sensor 22. However, the threshold value of the threshold generator 47 is a predetermined value and there is no disclosure of setting the threshold value for each element based on a difference signal generated for each element at each detection. Further, Hauck describes setting a plurality of threshold values but likewise fails to disclose or suggest the aforementioned feature of Claim 230.

The other art of record also fails to disclose or suggest at least the above-mentioned features.


For the foregoing reasons, Applicants submit that Claim 230 is patentable over the art of record. Claim 242 recites features similar to those of Claim 230. Claim 244 is a method claim corresponding to Claim 230, Claim 245 is a method claim corresponding to Claim 242, Claim 246 is a coordinate input apparatus claim corresponding to Claim 230, and Claim 247 is a coordinate input apparatus claim corresponding to Claim 242. Applicants submit that the other independent claims are patentable for reasons similar to Claim 230.

The dependent claims are believed patentable for reasons similar to the independent claims, as well as for the additional features they recite.

For the foregoing reasons, Applicants submit that this application is in condition for allowance. Favorable reconsideration, withdrawal of the outstanding rejections, and an early Notice of Allowance are requested.

Applicants' undersigned attorney may be reached in our Washington, DC office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brian L. Klock", written over a horizontal line.

Attorney for Applicants
Brian L. Klock
Registration No.36,570

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200
BLK/lmj

DC_MAIN 174052v2